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11 IN THE UNITED STATES DISTRICT COURT
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13 EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 v.
16 Plaintiff,

17 APPROXIMATELY \$25,000.00 IN
18 U.S. CURRENCY,

19 Defendant.

20 CASE NO. 1:22-MC-00035-JLT

21 STIPULATION AND ORDER EXTENDING TIME
22 FOR FILING A COMPLAINT FOR FORFEITURE
23 AND/OR TO OBTAIN AN INDICTMENT
24 ALLEGING FORFEITURE

25 It is hereby stipulated by and between the United States of America and potential claimant Jesus
26 Pedro Maldonado Ceja (“claimant”), by and through their respective counsel, as follows:

27 1. On or about December 1, 2021, claimant Maldonado Ceja filed a claim in the
28 administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the
29 Approximately \$25,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on
30 September 2, 2021.

31 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
32 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
33 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the
34 claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture
35 proceeding.

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1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the
5 parties. That deadline was March 1, 2022.

6 4. By Stipulation and Order filed March 4, 2022, the parties stipulated to extend to May 2,
7 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant property and/or to obtain an indictment alleging that the defendant property is subject to
9 forfeiture.

10 5. By Stipulation and Order filed April 26, 2022, the parties stipulated to extend to July 31,
11 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
12 defendant property and/or to obtain an indictment alleging that the defendant property is subject to
13 forfeiture.

14 6. By Stipulation and Order filed July 29, 2022, the parties stipulated to extend to September
15 29, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
16 defendant property and/or to obtain an indictment alleging that the defendant property is subject to
17 forfeiture.

18 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
19 to November 28, 2022, the time in which the United States is required to file a civil complaint for
20 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
21 currency is subject to forfeiture.

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8. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to November 28, 2022.

Dated: September 28, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: September 28, 2022

/s/ Robert L. Forkner
ROBERT L. FORKNER
Attorney for potential claimant
Jesus Pedro Maldonado Ceja
(As approved by email on 9/28/22)

IT IS SO ORDERED.

Dated: September 29, 2022

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE